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Attorneys for Raymond Dietrich

In re

Carolyn E. Brown

Debtor.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY,
TRENTON VICINAGE**

Chapter 13

Case No. **20-20921**

Judge: Christine M. Gravelle

NOTICE OF APPEARANCE

TO: UNITED STATES BANKRUPTCY COURT

Please take notice that, pursuant to Rule 2002 of the Bankruptcy Rules, Patrick S. Convery, Esq. enters his appearance as counsel to Raymond Dietrich, and hereby appears in the above-captioned matter and requests that all notices given or required to be given and all papers served or required to be served in this case be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and papers referred to in Rule 2002 of the Bankruptcy Rules and also includes, without limitation, any notices of orders, pleadings, motions, applications, complaints, demands, hearings, plans, disclosure statements, requests, petitions, objections, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other documents brought before this Court with respect to these proceedings.

PLEASE TAKE FURTHER NOTICE that this appearance and request for notice is without prejudice to the rights, remedies and claims of Raymond Dietrich against other entities or any objection that may be made to the subject matter jurisdiction of the Court or the propriety of venue, and shall not be deemed a claim, construed to submit Raymond Dietrich to the jurisdiction of the Court or act as a waiver of Raymond Dietrich's right to a jury trial.

All rights remedies and claims of Raymond Dietrich are hereby expressly reserved, including without limitation, the right to a motion seeking abstention, withdrawal, dismissal or transfer of the case or a proceeding therein.

GIORDANO HALLERAN & CIESLA
Attorneys for Creditor, Raymond Dietrich

By: /s/ Patrick S. Convery
Patrick S. Convery

Dated: October 26, 2021